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Attorneys for Plaintiffs and Counterclaim Defendants
Michael F. Reeder and Pamela O'Keefe,
Trustee for the Jordan Grace Reeder Irrevocable Trust
and Trustee for the Darby Leigh Reeder Irrevocable Trust

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, NORTHERN DIVISION

MICHAEL F. REEDER,

Plaintiff,

v.

UNITED STATES OF AMERICA,
Defendant.

PAMELA M. O'KEEFE, as
Trustee for the JORDAN
GRACE REEDER
IRREVOCABLE TRUST,

Plaintiff,

v.

UNITED STATES OF
AMERICA,
Defendant.

Civil No.: 3:15-cv-00129-MMD
WGC

**SECOND JOINT STIPULATION
TO EXTEND THE BRIEFING
SCHEDULE FOR THE UNITED
STATES' MOTION FOR
SUMMARY JUDGMENT;
[PROPOSED] ORDER**

1 AND RELATED
2 COUNTERCLAIMS

3 COMES now Plaintiffs and Counterclaim Defendants Michael F. Reeder
4 (“Reeder”) and Pamela O’Keefe, as Trustee of the Jordan Grace Reeder
5 Irrevocable Trust, dated April 15, 1993 (“JGR Trust”) and the Darby Leigh Reeder
6 Irrevocable Trust (“DLR Trust”), Defendant and Counterclaimant, United States of
7 America (“United States”), by and through their undersigned counsel, and submit a
8 joint stipulation to extend the briefing dates with respect to the Motion for
9 Summary Judgment which was refiled by the United States of America (“United
10 States”) with this Court on April 15, 2019 [ECF 84].
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12 The Motion for Summary Judgment was originally filed on May 1, 2018
13 [ECF 65]. Meanwhile, Plaintiffs and Counterclaim Defendants submitted a global
14 settlement offer to the government. Formal consideration of the offer by the
15 government was ongoing until approximately April 15, 2019. Upon the tentative
16 rejection of the global settlement offer, the government refiled its Motion for
17 Summary Judgment in accordance with the Court’s Order of February 11, 2019
18 [ECF 81].
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20 Plaintiff’s counsel, together with Plaintiff, attended an in-person settlement
21 conference with the supervisor whom has settlement authority in Washington D.C.
22 on Thursday, May 16, 2019. The parties are optimistic that in principal a
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1 settlement has been reached, but there are still some terms to be determined
2 including reaching a workable payment plan. The proposed settlement will result
3 in a joint motion for stipulation to judgment resolving this action in its entirety.
4 Accordingly, the parties are hopeful that it will be not be necessary to further brief
5 the government's Motion for Summary Judgment.
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8 Based on the foregoing, the parties respectfully request an additional 60-day
9 extension to the briefing schedule. The parties stipulate that the current briefing
10 schedule dates be extended with the Opposition by the Plaintiff and Counter
11 Defendant to the United States' Motion for Summary Judgment to be filed by
12 August 12, 2019, and the United States' Reply Brief to be filed by September 12,
13 2019. The Parties will immediately advise the Court when a full settlement is
14 reached.
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19 PANITZ & KOSSOFF, LLP
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21 DATED: May 23, 2019

22 /s/Barbara E. Lubin
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28 Attorneys for Plaintiffs and
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RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

DATED: May 23, 2019

/s/Henry C. Darmstadter
HENRY C. DARMSTADTER
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United States Attorney
District of Nevada
Of Counsel

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT
JUDGE

DATED: May 23, 2019